

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY LLC, et al.,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
	§	<b>Re: Docket Nos. 4 &amp; 152</b>

**NOTICE OF FILING REVISED PROPOSED  
FINAL ORDER (I) AUTHORIZING DEBTORS TO (A) CONTINUE  
INSURANCE PROGRAMS, AND SURETY BOND PROGRAM, AND  
(B) PAY CERTAIN OBLIGATIONS WITH RESPECT THERETO; (II) GRANTING  
RELIEF FROM AUTOMATIC STAY WITH RESPECT TO WORKERS'  
COMPENSATION CLAIMS; AND (III) GRANTING RELATED RELIEF**

1. **PLEASE TAKE NOTICE THAT**, on August 4, 2020, Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Programs and the Surety Bond Program, and (B) Pay Certain Obligations with respect thereto; (II) Granting Relief from Automatic Stay with respect to Workers’ Compensation Claims; and (III) Granting Related Relief* (Docket No. 4) (the “**Motion**”), with a proposed form of final order granting the relief requested in the Motion attached thereto as Exhibit B (the “**Initial Proposed Final Order**”).

2. **PLEASE TAKE FURTHER NOTICE THAT**, the Debtors hereby file a revised proposed *Final Order (I) Authorizing Debtors to (A) Continue Insurance Programs, and*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

*Surety Bond Program, and (B) Pay Certain Obligations with respect thereto; (II) Granting Relief from Automatic Stay with respect to Workers' Compensation Claims; and (III) Granting Related Relief, attached hereto as **Exhibit A** (the "Revised Proposed Final Order").*

3. **PLEASE TAKE FURTHER NOTICE THAT**, a blackline of the Revised Proposed Final Order marked against the Initial Proposed Final Order is attached hereto as **Exhibit B** (the "Blackline").

4. **PLEASE TAKE FURTHER NOTICE THAT**, on August 19, 2020, JX Nippon Oil Exploration (U.S.A.) Limited filed the *JX Nippon Oil Exploration (U.S.A.) Limited's Objection to Motion of Debtors for Final Order (I) Authorizing Debtors to (A) Continue Insurance Programs and the Surety Bond Program, and (B) Pay Certain Obligations With Respect Thereto; (II) Granting Relief from Automatic Stay with respect to Workers' Compensation Claims; and (III) Granting Related Relief* (Docket No. 189) (the "**Objection**"). The Revised Proposed Final Order resolves the Objection. In addition, the Debtors have received comments from various surety providers to the Initial Proposed Final Order. The Revised Proposed Final Order resolves some, but not all, of the comments raised by the surety providers.

5. **PLEASE TAKE FURTHER NOTICE THAT**, the Debtors intend to request entry of the Revised Proposed Final Order at the hearing on the Motion, which is currently scheduled for **September 14, 2020 at 1:30 P.M. (prevailing Central Time)**. The Debtors reserve all rights to alter, amend, update, or modify the Revised Proposed Final Order at or prior to the hearing on the Motion.

Dated: September 13, 2020  
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez  
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-and-

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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**Certificate of Service**

I hereby certify that on September 13, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez